UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

In Re: NEW ENGLAND COMPOUNDING PHARMACY, INC., PRODUCTS LIABILITY)	
LITIGATION)	MDL NO. 2419
)	Dkt. No. 1:13-md-2419 (RWZ)

STIPULATION REGARDING THE DEADLINE TO FILE OBJECTIONS AND RESPOND TO PLAINTIFFS' STEERING COMMITTEE'S SUBPOENA ISSUED JANUARY 29, 2016 BY COUNSEL J. GERARD STRANCH, IV, ESQ.

Plaintiffs' Steering Committee and Cumberland Medical Center inform the Court of a stipulation between them regarding the deadline to file objections and respond to Plaintiffs' Steering Committee's Subpoena to Produce Documents, Information or Objects or to Permit Inspection of Premises in a Civil Action issued January 29, 2016, by Attorney J. Gerard Stranch, IV, and served by U.S. Mail on Cumberland Medical Center.

Counsel for Plaintiffs' Steering Committee and Counsel for Cumberland Medical Center have conferred regarding the subpoena issued by Attorney J. Gerard Stranch, IV, on behalf of his client, Plaintiffs' Steering Committee. CMC and the PSC have agreed that, due to the depth and breadth of the aforementioned subpoena request, Cumberland Medical Center requires additional time to reasonably determine what, if any, objections it may have to the Plaintiffs' Steering Committee's Subpoena, and that Cumberland Medical Center requires more time to respond to the same as currently commanded.

Accordingly, Plaintiffs' Steering Committee and Cumberland Medical Center have stipulated that the deadline for Cumberland Medical Center to object to Plaintiffs' Steering Committee's subpoena will be March 7, 2016. The Plaintiffs' Steering Committee and

Cumberland Medical Center further stipulates that the deadline for Cumberland Medical Center to respond to its subpoena will be March 23, 2016.

Respectfully submitted this this 12th day of February, 2016.

ARNETT, DRAPER & HAGOOD, LLP

By: /s/ Rachel P. Hurt

Rachel P. Hurt, BPR No. 026515

Attorneys for Cumberland Medical Center

P.O. Box 300

2300 First Tennessee Plaza

Knoxville, Tennessee 37901-0300

(865) 546-7000

/s/ Anthony A. Orlandi

J. Gerard Stranch, IV Benjamin A. Gastel Anthony A. Orlandi BRANSTETTER, STRANCH & JENNINGS, PLLC 223 Rosa L. Parks Ave., Suite 200

Nashville, TN 37203 Telephone: 615/254-8801 Facsimile: 615/255-5419 gerards@bsjfirm.com beng@bsjfirm.com aorlandi@bsjfirm.com

Plaintiffs' Steering Committee and TN Chair

Thomas M. Sobol Kristen Johnson Parker HAGENS BERMAN SOBOL SHAPIRO, LLP 55 Cambridge Parkway, Suite 301

Cambridge, MA 02142 Telephone: 617/482-3700 Facsimile: 617/482-3003

tom@hbsslaw.com kristenjp@hbsslaw.com

Plaintiffs' Lead Counsel

Annika K. Martin
Mark P. Chalos
LIEFF CABRASER, HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
Telephone: 212/355-9500
Facsimile: 212/355-9592
akmartin@lchb.com

Federal/State Liaison

mchalos@lchb.com

Marc E. Lipton LIPTON LAW 18930 W. 10 Mile Road Southfield, MI 48075 Telephone: 248/557-1688 Facsimile: 248/557-6344 marc@liptonlaw.com

Kimberly A. Dougherty JANET, JENNER & SUGGS, LLC 31 St. James Avenue, Suite 365 Boston, MA 02116 Telephone: 617/933-1265 kdougherty@myadvocates.com

Mark Zamora
ZAMORA FIRM
6 Concourse Parkway, 22nd Floor
Atlanta, GA 30328
Telephone: 404/451-7781
Facsimile: 404/506-9223
mark@markzamora.com

Patrick T. Fennell (VSB 40393) CRANDALL & KATT 366 Elm Avenue, S.W. Roanoke, VA 24016 Telephone: 540/342-2000 Facsimile: 540/400-0616 pfennell@crandalllaw.com

Plaintiffs' Steering Committee

Case 1:13-md-02419-RWZ Document 2655 Filed 02/12/16 Page 4 of 4

CERTIFICATE OF SERVICE

I, Anthony A. Orlandi, hereby certify that I caused a copy of the foregoing document to

be filed electronically via the Court's electronic filing system. Those attorneys who are

registered with the Court's electronic filing system may access these filings through the Court's

system, and notice of these filings will be sent to these parties by operation of the Court's

electronic filing system.

Dated: February 12, 2016

BRANSTETTER, STRANCH & JENNINGS, PLLC

By:__/s/ Anthony A. Orlandi_

Anthony A. Orlandi